

**SOED**

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CAVISHA OM UNIQUE JACKSON,

Plaintiff,

vs.

KEY INSURANCE COMPANY, a foreign  
corporation; DOE I through X, inclusive; ROE  
CORPORATIONS I through X, inclusive,

Defendants.

Case No. : 2:23-cv-01036 -JAD-DJA

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND DISCOVERY  
DEADLINES  
(First Request)**

Plaintiff CAVISHA OM UNIQUE JACKSON, by and through her attorneys of record MICHAEL C. KANE, ESQ., and BRADLEY J. MYERS, ESQ., of THE702FIRM, and Defendant, KEY INSURANCE COMPANY, by and through their attorney of record PHILIP GOODHART, ESQ. of THORNDAL ARMSTRONG, PC, hereby stipulate and request that the Court approve their request to extend discovery deadlines 90 days pursuant to Local Rule IR 6-1, Local Rule 26-3, and FRCP 26. Pursuant to Local Rule IA 6-1(a), the parties aver that this is the first discovery extension requested in this matter.

**A. DISCOVERY COMPLETED TO DATE**

The parties have conducted the following discovery to date:

1. The parties conducted an initial FRCP 26(f) conference.
2. Plaintiff disclosed her Initial FRCP 26.1 Disclosure;
3. Plaintiff served written discovery upon Defendant and responses are pending.

**B. DISCOVERY TO BE COMPLETED**

1. Defendant's FRCP 26.1 Disclosures.
2. Defendant's Discovery Responses to Plaintiff's written discovery.
3. Plaintiff's deposition.
4. Deposition of Defendant's 30(b)(6) witness(es).
5. Retain and disclose experts.
6. Expert Depositions; and
7. Any Additional Discovery Deemed Necessary.

**C. REASON FOR THE REQUESTED EXTENSION OF DISCOVERY**

The parties have been engaged in settlement discussions and possibly resolving this case.

The parties wish to use their time, energy and resources with retaining experts and conducting additional discovery towards resolution. The most efficient way to do so is to continue the discovery deadlines in this matter to allow further settlement discussions and possible mediation to occur while giving it the best chance of resolving this matter. Thus, the parties believe that good cause exists to continue discovery so that a mediation can occur. The parties have been working in a diligent and courtesy manner to complete discovery and not for the purpose of delay.

The parties therefore Stipulate, and believe good cause exists, to extend the deadlines in the civil case for a period of **90 days**.

**D. PROPOSED NEW DEADLINES**

	<u><b>Current Deadline</b></u>	<u><b>Proposed Deadline</b></u>
<b>Amend Pleadings or Add Parties</b>	December 30, 2023	<b>Expired</b>
<b>Initial Expert Disclosures Deadline</b>	January 29, 2024	<b>April 29, 2024</b>
<b>Rebuttal Expert Disclosures Deadline</b>	February 28, 2024	<b>May 29, 2024</b>
<b>Discovery Complete</b>	March 29, 2024	<b>June 27, 2024</b>
<b>Dispositive Motions</b>	April 29, 2024	<b>July 29, 2024</b>
<b>Joint Pretrial Order</b>	May 29, 2024	<b>August 27, 2024</b>

**IT IS SO STIPULATED.**

**THE702FIRM**

Dated this 4<sup>th</sup> of January, 2024.

*/s/ Michael Kane*

MICHAEL C. KANE, ESQ. (10096)  
BRADLEY J. MYERS, ESQ. (8857)  
8335 West Flamingo Road  
Las Vegas, Nevada 89147  
*Attorneys for Plaintiff*

**THORNDAL ARMSTRONG, PC**

Dated this 4<sup>th</sup> of January, 2024.

*/s/ Philip Goodhart*

PHILIP GOODHART, ESQ. (5332)  
1100 East Bridger Avenue  
Las Vegas, NV 89101-5315  
*Attorneys for Defendant*  
**KEY INSURANCE COMPANY**

**IT IS SO ORDERED:**



**UNITED STATES MAGISTRATE JUDGE**

**DATED:** 1/8/2024